

October 12, 2017 Project No. 8128.02.02

Dana Bayuk Oregon Department of Environmental Quality Northwest Region 700 NE Multnomah Street, Suite 600 Portland, Oregon 97232

Re: Monthly Progress Report—September 2017 Siltronic Corporation

7200 NW Front Avenue, Portland, OR

Order No. ECVC-NWR-00-27

#### Dear Dana:

The Order Requiring Remedial Investigation and Source Control Measures, Oregon Department of Environmental Quality (DEQ) No. ECVC-NWR-00-27, issued by DEQ to Siltronic Corporation (Siltronic) and NW Natural (NWN) on October 4, 2000 (the 2000 Joint Order), requires submittal of monthly progress reports. This progress report encompasses the reporting period spanning September 1, 2017 through September 30, 2017. The next progress report is due November 15, 2017.

Because the 2000 Joint Order and the 2016 Unilateral Order (No. OPSR-NWR-16-02, issued to Siltronic on August 16, 2016 [2016 UAO]) have overlapping requirements on the Siltronic Operable Unit (SOU), Siltronic has previously sought to confirm that the Stormwater Source Control Evaluation (SSCE)<sup>1</sup> work on the SOU met the needs of both the 2000 Joint Order and the 2016 UAO. In a letter dated February 15, 2017, DEQ requested that Siltronic compile all SSCE work into a single work plan. As such, future work related to the SSCE will be provided in this monthly progress report related to the 2000 Joint Order. In doing so, unless DEQ instructs otherwise, Siltronic will proceed under the notion that this reporting regime will concurrently satisfy any overlapping requirements shared between the 2000 Joint Order and the 2016 Unilateral Order concerning activities undertaken on the SOU, while also meeting DEQ's request that the SSCE work be conducted under a single work plan. Therefore, the

<sup>&</sup>lt;sup>1</sup> In a letter dated May 23, 2017, provided by DEQ in response to Siltronic's submittal of its Revised Source Control Evaluation Work Plan, DEQ requested that "future related submittals appropriately reference stormwater source control only." Siltronic is happy to oblige and will hereafter refer to this work as Stormwater Source Control Evaluation (SSCE).

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2000 Order monthly progress reports will include the SSCE efforts, and those activities related to the Gasco Operable Unit (GOU)–Allen property.

# ACTIONS TAKEN UNDER THE 2000 JOINT ORDER SINCE THE PREVIOUS PROGRESS REPORT

#### Communications and Submittals

On September 15, MFA submitted a monthly progress report to DEQ for work performed by MFA on behalf of Siltronic in August 2017, pursuant to the 2000 Joint Order.

On September 27, DEQ provided comments on the Overland Flow Assessment and Groundwater Intrusion memoranda, previously submitted to DEQ by MFA as part of the ongoing SSCE efforts.

#### **Fieldwork**

On September 25, 27, 28 and 29, MFA conducted quarterly monitoring of Siltronic groundwater wells, consistent with the DEQ-approved performance monitoring program. The quarterly monitoring event continued into October and was concluded on October 10.

# **ACTIONS TO BE TAKEN IN THE NEXT TWO MONTHS**

# Communications and Submittals

MFA anticipates submitting a revised groundwater intrusion figure, along with tabulated well and manhole elevations, by October 11, as directed by DEQ in the September 27 comments.

#### **Fieldwork**

October field activities will include quarterly water level measurements; bimonthly PG & C waste dense nonaqueous-phase liquid thickness measurements at selected wells (WS-15-85, WS-33-81, and WS-43-36); groundwater performance monitoring; bimonthly combustible-gas measurements; and bimonthly and semiannual vapor sampling.

November field activities will include data collection from transducers installed in select monitoring wells.

Weather permitting, stormwater sampling will be conducted consistent with the Revised SSCE Work Plan approved by DEQ.

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# TEST RESULTS AND DATA RECEIVED

The attached Microsoft® (MS) Excel® data file contains performance and quarterly groundwater monitoring data, as well as the soil vapor data received through the end of the reporting period.

#### PROBLEMS EXPERIENCED OR RESOLVED

No problems were experienced during the reporting period.

Please call Michael Murray at (971) 544-2139 if you have any questions or comments regarding the contents of this month's progress report.

Sincerely,

Maul Foster & Alongi, Inc.

Michael R. Murray, RG, EIT

Senior Hydrogeologist

Courtney Savoie, RG

Project Geologist

Attachment/enclosure: MS Excel file (as attachment to the e-mail and on CD with the

hard copy)

cc: Myron Burr, Siltronic

Ilene M. Munk, Foley & Mansfield

Chris Reive and David Rabbino, Jordan Ramis

Keith Johnson, DEQ

Paul Siedel, DEQ

Henning Larsen, DEQ

Matt McClincy, DEQ

Eva DeMaria, USEPA

Sean Sheldrake, USEPA

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Ben Hung, Anchor QEA LLC

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John Renda, Anchor QEA LLC Jen Mott, Anchor QEA LLC Halah Voges, Anchor QEA LLC Taku Fuji, Anchor QEA LLC Rob Ede, Hahn and Associates, Inc.

# **ATTACHMENT**

MS EXCEL FILE

